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**Pro Hac Vice Applications to be Submitted*

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**ATTORNEYS FOR OPERATORS OF
NHENTAI.NET**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

PCR DISTRIBUTING CO., a company
organized under the laws of California,

Plaintiff

vs.

JOHN DOES 1-20 d/b/a
NHENTAI.NET

Defendants

Case No. 2:24-cv-07453- FLA-AJR

**NHENTAI.NET'S RESPONSE TO
PLAINTIFF'S MOTION FOR
EARLY DISCOVERY**

Date: October 4, 2024; 1:30 p.m.

Place: First Street Courthouse

350 W. 1st Street

Courtroom 6B, 6th Floor

Los Angeles, California 90012


Judge: Hon. Fernando L. Aenlle-Rocha

1 TO THE HONORABLE COURT:

2 The operators of the nhentai.net website (“Nhentai.net”) whose information is
3 the subject of PCR Distributing, Co.’s (“Plaintiff” or “PCR”) Motion for Early
4 Discovery (Dkt. No. 10) hereby notify the Court and counsel for Plaintiff that
5 Nhentai.net intends to file a Motion for Protective Order and to permit any potential
6 Nhentai.net-related defendants to proceed anonymously. Counsel for Nhentai.net
7 has only recently learned of the early discovery proposed by Plaintiff into
8 information of a highly confidential and sensitive nature, including Nhentai.net’s
9 *“login information, billing and transaction records, account information, server*
10 *logs and IP addresses, email exchanges, and IP login information* related to the
11 Defendants’ accounts for the NHentai.net domain name.” Dkt. No. 10 at 7, lines 10-
12 14 (emphasis added). Among other things, Plaintiff’s request implicates serious data
13 privacy concerns relating to Nhentai.net’s login information. Plaintiff is also broadly
14 requesting Nhentai.net’s private and highly confidential financial information such
15 as billing and transaction records and account information, which would necessarily
16 include payment information such as complete credit card numbers. Plaintiff does
17 not propose any protections for such information being made public.

18 Prior to deciding Plaintiff’s Motion for Early Discovery (Dkt. No. 10),
19 Nhentai.net respectfully asks this Court to permit Nhentai.net to file motions for
20 protection relating to the information sought by Plaintiff’s overly broad and highly
21 improper requests and how it may be used in this case going forward.

22 Dated: September 26, 2024

By: 

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16 **Attorneys for Operators of**
17 **Nhentai.net**

18 **CERTIFICATE OF SERVICE**

19 On September 26, 2024, I filed the foregoing document with the clerk of court
20 for the U.S. District Court, Central District of California via CM/ECF. I hereby
21 certify that I thereby have served the document on all counsel and/or pro se parties
22 of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) and the
23 Local Rules.

24 /s/ 
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